

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
AT LAW AND IN ADMIRALTY

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No.

APPROXIMATELY \$20,300.00 IN UNITED
STATES CURRENCY, and

APPROXIMATELY \$17,000.00 IN UNITED
STATES CURRENCY,

Defendants.

VERIFIED COMPLAINT FOR CIVIL FORFEITURE IN REM

The United States of America, by its attorneys, Matthew D. Krueger, United States Attorney for the Eastern District of Wisconsin, and Scott J. Campbell, Assistant United States Attorney for this district, alleges the following in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

Nature of the Action

1. This is a civil action to forfeit properties to the United States of America, under 21 U.S.C. § 881(a)(6), for violations of 21 U.S.C. § 841(a)(1).

The Defendants In Rem

2. The defendant property, approximately \$20,300.00 in United States currency, was seized on or about January 15, 2020, from Jose Perez-Trujillo at or near 4XXX N. 83rd Street, Milwaukee, Wisconsin.

3. The defendant property, approximately \$17,000.00 in United States currency, was seized on or about January 15, 2020, from Jose Perez-Trujillo at or near 4XXX N. 83rd Street, Milwaukee, Wisconsin.

4. The defendant properties are presently in the custody of the United States Marshal Service in Milwaukee, Wisconsin.

Jurisdiction and Venue

5. This Court has subject matter jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).

6. This Court has *in rem* jurisdiction over the defendant properties under 28 U.S.C. § 1355(b).

7. Venue is proper in this district under 28 U.S.C. § 1355(b)(1), because the acts or omissions giving rise to the forfeiture occurred in this district.

Basis for Forfeiture

8. The defendant property, approximately \$20,300.00 in United States currency, is subject to forfeiture to the United States of America under 21 U.S.C. § 881(a)(6) because it was used or intended to be used in exchange for controlled substances, represents proceeds of trafficking in controlled substances, or was used or intended to be used to facilitate a violation of 21 U.S.C. § 841(a)(1).

9. The defendant property, approximately \$17,000.00 in United States currency, is subject to forfeiture to the United States of America under 21 U.S.C. § 881(a)(6) because it was used or intended to be used in exchange for controlled substances, represents proceeds of trafficking in controlled substances, or was used or intended to be used to facilitate a violation of 21 U.S.C. § 841(a)(1).

Facts

10. Cocaine is a Schedule II controlled substance under 21 U.S.C. § 812.

November 25, 2019 controlled buy of cocaine from Jose Perez-Trujillo, and December 2, 2019 payment to Perez-Trujillo for the cocaine

11. On November 25, 2019, during a phone conversation between Jose Perez-Trujillo and a Milwaukee Metropolitan Drug Enforcement Group confidential informant (“CI”), Perez-Trujillo stated that Perez-Trujillo would front¹ an ounce of cocaine to the CI and that the CI would need to pay Perez-Trujillo \$1,100 for that cocaine within one week of Perez-Trujillo’s delivery of the cocaine to the CI.

12. Perez-Trujillo instructed the CI to meet Perez-Trujillo at 5740 W. Fond du Lac Avenue in Milwaukee (the “meet location,” which is a business) to conduct the drug transaction.

13. When the CI arrived at the meet location, the CI pulled into the parking lot and parked CI’s vehicle.

14. Perez-Trujillo’s vehicle, a 2004 Chevrolet pick-up truck with Wisconsin registration number MKXXXX, was already parked in the lot when the CI arrived. Perez-Trujillo was the sole individual inside the truck and was seated in the driver’s seat.

15. The CI exited CI’s vehicle and entered the front passenger side of Perez-Trujillo’s truck.

16. While inside Perez-Trujillo’s truck, Perez-Trujillo handed the CI a baggie containing approximately 28.02 grams of cocaine.

17. This November 25, 2019 drug transaction was audio and video recorded.

18. After the drug transaction, the CI returned to CI’s vehicle and drove away from the meet location with the cocaine.

¹ When a drug dealer “fronts” drugs to an individual, the dealer gives drugs to that individual and, in turn, expects that individual to sell the drugs and pay back the dealer from the sales proceeds.

19. On December 2, 2019, the CI met with Perez-Trujillo at the same meet location, 5740 W. Fond du Lac Avenue, and paid \$1,100 to Perez-Trujillo for the approximately 28.02 grams of cocaine that Perez-Trujillo had fronted to the CI on November 25, 2019.

December 17, 2019 controlled buy of cocaine from Jose Perez-Trujillo, and December 22, 2019 payment to Perez-Trujillo for the cocaine

20. On December 17, 2019, during a phone conversation between Jose Perez-Trujillo and the CI, Perez-Trujillo stated that Perez-Trujillo would front an ounce of cocaine to the CI and that the CI would need to pay Perez-Trujillo \$1,100 for that cocaine within one week of Perez-Trujillo's delivery of the cocaine to the CI.

21. Perez-Trujillo instructed the CI to meet Perez-Trujillo at Perez-Trujillo's residence, 4XXX N. 83rd Street in Milwaukee, to conduct the drug transaction.

22. When the CI arrived at Perez-Trujillo's residence, CI parked CI's vehicle behind Perez-Trujillo's 2004 Chevrolet pick-up truck and waited in CI's vehicle.

23. About one minute later, Perez-Trujillo exited Perez-Trujillo's residence, walked to Perez-Trujillo's 2004 Chevrolet pick-up truck, opened the driver's door, leaned inside the vehicle, shut the driver's door, and walked over to the CI's vehicle.

24. Perez-Trujillo approached the front passenger side of CI's vehicle and entered CI's vehicle.

25. While inside CI's vehicle, Perez-Trujillo handed the CI a baggie containing approximately 27.7 grams of cocaine.

26. This December 17, 2019 drug transaction was audio and video recorded.

27. After the drug transaction, Perez-Trujillo exited CI's vehicle, and walked back to and entered Perez-Trujillo's residence, and the CI drove away from the meet location with the cocaine.

28. On December 22, 2019, the CI met with Perez-Trujillo at 3XXX N. 12th Street in Milwaukee, and paid \$1,100 to Perez-Trujillo for the approximately 27.7 grams of cocaine that Perez-Trujillo had fronted to the CI on December 17, 2019.

January 8, 2020 controlled buy of cocaine from, and payment to, Jose Perez-Trujillo

29. On January 8, 2020, during a phone conversation between Jose Perez-Trujillo and the CI, Perez-Trujillo agreed to sell the CI one-half ounce of cocaine. Perez-Trujillo instructed the CI to meet Perez-Trujillo at 5740 W. Fond du Lac Avenue in Milwaukee (the “meet location”) to conduct the drug transaction.

30. When the CI arrived at the meet location, the CI pulled into the parking lot and parked CI’s vehicle.

31. Perez-Trujillo’s 2004 Chevrolet pick-up truck was already parked in the lot when the CI arrived. Perez-Trujillo was sitting in the front passenger seat of the truck, and another male was sitting in the driver’s seat.

32. The CI exited CI’s vehicle, walked to the passenger side of Perez-Trujillo’s truck, and opened the door.

33. The CI handed \$550 in pre-recorded buy money to Perez-Trujillo, and Perez-Trujillo handed the CI a baggie containing approximately 13.58 grams of cocaine.

34. This January 8, 2020 drug transaction was audio and video recorded.

35. After the drug transaction, the CI returned to CI’s vehicle and drove away from the meet location with the cocaine.

January 15, 2020 execution of search warrant at the residence of Jose Perez-Trujillo

36. On January 15, 2020, officers executed a search warrant at the residence of Jose Perez-Trujillo and his wife, M.R., located at 4XXX N. 83rd Street, Milwaukee, Wisconsin (the “Residence”).

37. The Residence had approximately seven working surveillance cameras mounted on the outside of the Residence and the detached garage.

38. Jose Perez-Trujillo, M.R., and their daughter, A.P., were present at the Residence during execution of the search warrant.

39. A drug detection canine gave positive alerts to several locations in the basement bedroom of the Residence – namely, the fireplace, dresser, and closet – and in the area near the bar in the basement.

40. On January 15, 2020, the following items, among others, were inside the Residence:

- A. On top of refrigerator were the following:
 - i. A 9mm Glock 17 pistol;
 - ii. A loaded Glock magazine;
 - iii. Two holsters; and
 - iv. A weapons light.
- B. In the basement bedroom, where Perez-Trujillo stated he sleeps, were the following:
 - i. A Sig P250 pistol in the nightstand;
 - ii. A Smith & Wesson M&P15 rifle in the closet;
 - iii. An open box of 9mm ammunition on top of the nightstand;
 - iv. Two loaded AR magazines in the nightstand;
 - v. Perez-Trujillo's cell phone on top of the nightstand;
 - vi. An operating security system with TV;
 - vii. Approximately \$20,830 in United States currency. The currency was located inside different dresser drawers. Some of the money was wrapped with rubber bands.

- a. The approximately \$20,830 contained \$530 in pre-recorded buy money that the CI had paid to Perez-Trujillo on January 8, 2020, for the 13.58 grams of cocaine.
 - b. After subtracting the \$530 in pre-recorded buy money, the remaining approximately \$20,300 in United States currency is one of the defendant property items in this case.
 - c. Denominations of the approximately \$20,300 were 92-\$100 bills, 36-\$50 bills, 458-\$20 bills, 13-\$10 bills, and 2-\$5 bills.
- viii. Approximately \$17,000 in United States currency, which is one of the defendant property items in this case.
 - a. The approximately \$17,000 was inside a white plastic bag located inside a metal fireplace.
 - b. The approximately \$17,000 was sorted in multiple stacks and wrapped with rubber bands.
 - c. Denominations of the approximately \$17,000 were 8-\$100 bills and 810-\$20 bills.

C. In the basement next to the bar was a Kolibri money counter.

41. On January 15, 2020, the following items, among others, were inside the 2004 Chevrolet pick-up truck, Wisconsin registration number MKXXXX, which was parked at the Residence:

- A. A Chase Bank statement for Jose Perez-Trujillo in the center console;
- B. Two baggies containing a total of approximately 25.83 grams of crack cocaine; and
- C. One baggie containing approximately 27.84 grams of cocaine.
- D. The three baggies containing cocaine and crack cocaine were inside a white plastic bag that was inside a hat located on the floorboard between the driver and passenger seats.

42. On January 15 2020, Jose Perez-Trujillo was arrested.

Jose Perez-Trujillo's State Drug Charge

43. On January 19, 2020, Jose Perez-Trujillo was charged in Milwaukee County Circuit Court, Case No. 20CF304, with possession of cocaine with intent to deliver.

44. A jury trial in Case No. 20CF304 is scheduled for October 19, 2020.

February 6, 2020 controlled buy of cocaine from, and payment to, Jose Perez-Trujillo

45. On or about January 29, 2020, Jose Perez-Trujillo posted \$7,500 cash bond in Milwaukee County Case No. 20CF304 and was released from custody.

46. On February 5, 2020, during a phone conversation between Jose Perez-Trujillo and the CI, Perez-Trujillo agreed to sell the CI and an undercover officer ("UC") one-half ounce of cocaine for \$550 the following day. Perez-Trujillo instructed the CI to meet Perez-Trujillo at 5740 W. Fond du Lac Avenue in Milwaukee (the "meet location") to conduct the drug transaction.

47. On February 6, 2020, when the CI and UC arrived together at the meet location, the CI and UC pulled into the parking lot and parked their vehicle.

48. Perez-Trujillo arrived at the meet location about one hour later in Perez-Trujillo's 2004 Chevrolet pick-up truck. Perez-Trujillo was the driver, and another individual was sitting in the passenger's seat.

49. Perez-Trujillo exited his Chevrolet pick-up truck, walked to CI and UC's vehicle, and entered the rear passenger side of CI and UC's vehicle.

50. The CI introduced Perez-Trujillo to the UC.

51. Perez-Trujillo handed the UC a baggie containing approximately 13.56 grams of cocaine, and the UC handed \$550 to Perez-Trujillo as payment for the cocaine.

52. During the drug transaction, Perez-Trujillo told UC the following:

- A. UC could now call Perez-Trujillo directly (to buy cocaine without having to go through the CI);
 - B. Perez-Trujillo could get “ten, five, eight” and could get whatever at one time or even by the piece (referring to cocaine); and
 - C. Perez-Trujillo was ready to sell (cocaine) at any time.
53. This February 6, 2020 drug transaction was audio and video recorded.
54. After the drug transaction, Perez-Trujillo returned to his Chevrolet pick-up truck, and the CI and UC drove away from the meet location with the cocaine.

Administrative Forfeiture Proceedings

55. The Drug Enforcement Administration (“DEA”) began administrative forfeiture proceedings against the approximately \$20,300.00 in United States currency and the approximately \$17,000.00 in United States currency on the ground that the seized currency items were used or intended to be used in exchange for controlled substances or were proceeds of trafficking in controlled substances.

56. On or about March 25, 2020, Jose Perez-Trujillo filed a claim with the DEA in the administrative forfeiture proceeding to the defendant approximately \$20,300.00 in United States currency.

57. On or about March 31, 2020, Jose Perez-Trujillo filed a claim with the DEA in the administrative forfeiture proceeding to the defendant approximately \$17,000.00 in United States currency.

Warrant for Arrest In Rem

58. Upon the filing of this complaint, the plaintiff requests that the Court issue an arrest warrant *in rem* pursuant to Supplemental Rule G(3)(b), which the plaintiff will execute upon the defendant properties pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

Claims for Relief

59. The plaintiff alleges and incorporates by reference the paragraphs above.

60. By the foregoing and other acts, the defendant property, approximately \$20,300.00 in United States currency, was used or intended to be used in exchange for controlled substances, represents proceeds of trafficking in controlled substances, or was used or intended to be used to facilitate a violation of 21 U.S.C. § 841(a)(1).

61. The defendant approximately \$20,300.00 in United States currency is therefore subject to forfeiture to the United States of America under 21 U.S.C. § 881(a)(6).

62. By the foregoing and other acts, the defendant property, approximately \$17,000.00 in United States currency, was used or intended to be used in exchange for controlled substances, represents proceeds of trafficking in controlled substances, or was used or intended to be used to facilitate a violation of 21 U.S.C. § 841(a)(1).

63. The defendant approximately \$17,000.00 in United States currency is therefore subject to forfeiture to the United States of America under 21 U.S.C. § 881(a)(6).

WHEREFORE, the United States of America prays that a warrant of arrest for the defendant properties be issued; that due notice be given to all interested parties to appear and show cause why the forfeiture should not be decreed; that judgment declare the defendant properties to be condemned and forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other and further relief as this Court may deem just and equitable, together with the costs and disbursements of this action.

Dated at Milwaukee, Wisconsin, this 19th day of June, 2020.

Respectfully submitted,

MATTHEW D. KRUEGER
United States Attorney

By: s/SCOTT J. CAMPBELL
SCOTT J. CAMPBELL
Assistant United States Attorney
Scott J. Campbell Bar Number: 1017721
Attorney for Plaintiff
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Milwaukee, Wisconsin 53202
Telephone: (414) 297-1700
Fax: (414) 297-1738
E-Mail: scott.campbell@usdoj.gov

Verification

I, Stephen Heckler, hereby verify and declare under penalty of perjury that I am a narcotics investigator with the Milwaukee Metropolitan Drug Enforcement Group ("MMDEG"), that I have read the foregoing Verified Complaint for Civil Forfeiture *in rem* and know the contents thereof, and that the factual matters contained in paragraphs 10 through 54 of the Verified Complaint are true to my own knowledge.

The sources of my knowledge and information are the official files and records of the United States, information supplied to me by other law enforcement officers, as well as my investigation of this case, together with others, as a narcotics investigator with the MMDEG.

I hereby verify and declare under penalty of perjury that the foregoing is true and correct.

Date: 06-17-2020

s/STEPHEN HECKLER
Stephen Heckler
Narcotics Investigator
Milwaukee Metropolitan Drug Enforcement Group

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

Place an "X" in the appropriate box: ☐ Green Bay Division ☒ Milwaukee Division

I. (a) PLAINTIFFS

UNITED STATES OF AMERICA

(b) County of Residence of First Listed Plaintiff _____

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Scott J. Campbell, AUSA

US Attorney's Office, #530 Federal Building

517 E. Wisconsin Avenue, Milwaukee, WI 53202 (414-297-1700)

DEFENDANTS

APPROXIMATELY \$20,300.00 IN UNITED STATES CURRENCY, et al.

County of Residence of First Listed Defendant Milwaukee

(IN U.S. PLAINTIFF CASES ONLY)

NOTE:

IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION

(Place an "X" in One Box Only)

☒ 1 U.S. Government Plaintiff

☐ 3 Federal Question (U.S. Government Not a Party)

☐ 2 U.S. Government Defendant

☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES

(Place an "X" in One Box for Plaintiff)

(For Diversity Cases Only)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. NATURE OF SUIT

(Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Med. Malpractice	<input checked="" type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIW W (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))
		IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee (Prisoner Petition) <input type="checkbox"/> 465 Other Immigration Actions	FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN

(Place an "X" in One Box Only)

☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
21 USC § 881(a)(6)

Brief description of cause:

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 **DEMAND \$**

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____

DOCKET NUMBER _____

DATE

SIGNATURE OF ATTORNEY OF RECORD

06/19/2020

s/SCOTT J. CAMPBELL

FOR OFFICE USE ONLY

RECEIPT # _____

AMERICAN JUDICIAL SYSTEM Case 2:20-cv-00926-JPS Filed 06/19/20 Page 1 of 1 Document 1-1

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
AT LAW AND IN ADMIRALTY

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No.

APPROXIMATELY \$20,300.00 IN UNITED
STATES CURRENCY, and

APPROXIMATELY \$17,000.00 IN UNITED
STATES CURRENCY,

Defendants.

WARRANT FOR ARREST IN REM

To: THE UNITED STATES MARSHAL
Eastern District of Wisconsin

WHEREAS, a Verified Complaint for Civil Forfeiture *in rem* was filed on the 19th day of June, 2020, by the United States Attorney for the Eastern District of Wisconsin, which seeks the forfeiture of the above-named defendant properties pursuant to Title 21, United States Code, Section 881(a)(6), and which prays that process issue to enforce the forfeiture and to give notice to all interested parties to appear before the court and show cause why the forfeiture should not be decreed; and due proceedings being had, that the defendant properties be condemned and forfeited to the use of the United States of America.

YOU ARE THEREFORE HEREBY COMMANDED to attach and arrest the following defendant properties, which are presently in the custody of the United States Marshal Service in

Milwaukee, Wisconsin, in the Eastern District of Wisconsin, and to detain the same until further order of this Court:

- A. Approximately \$20,300.00 in United States currency, which was seized on or about January 15, 2020, from Jose Perez-Trujillo at or near 4XXX N. 83rd Street, Milwaukee, Wisconsin; and
- B. Approximately \$17,000.00 in United States currency, which was seized on or about January 15, 2020, from Jose Perez-Trujillo at or near 4XXX N. 83rd Street, Milwaukee, Wisconsin.

Dated this _____ day of _____, 2020, at Milwaukee, Wisconsin.

GINA COLLETTI
Clerk of Court

By:

Deputy Clerk

Return

This warrant was received and executed with the arrest of the above-named defendants.

Date warrant received: _____

Date warrant executed: _____

Name and title of arresting officer: _____

Signature of arresting officer: _____

Date: _____